REMARKS

Claim Rejections - 35 USC §103

At section 3 of the Official Action, claims 1-29 are rejected under 35 USC §103(a) as unpatentable over US patent application publication 2004/021691, Dostie, et al (hereinafter Dostie) further in view of US patent 6,295,052, Kato, et al (hereinafter Kato).

With respect to claim 1, Dostie is applied for teaching a device for inputting information comprising the elements recited, including a display, a memory comprising a first set of characters of a character set and a second set of characters of said character set and wherein the display is configured to selectively display, for selection of which character to input, either the first set of characters or the second set of characters. The Office states that Dostie does not specifically teach that there is present two separate sets of alphanumeric characters and that only after the user interacts with the interface that two exist.

The Office further states that Dostie does not specifically teach wherein the alphanumeric characters of the first set of characters and the alphanumeric characters of the second set of characters are mutually exclusive. The Office states that Kato teaches alphanumeric characters of the first set of characters and the alphanumeric characters of the second set of characters are mutually exclusive and that Kato is in the same field of endeavor as Dostie. Applicant respectfully disagrees.

Brief Summary of Applicant's Invention

The following summary is provided with respect to applicant's invention. This summary is provided to assist the Office in understanding the nature of the present invention.

It is apparent in Figures 2a-2c and 3 of the present application that the present invention is directed toward increasing the probability of obtaining correct user input on a touch screen. This problem is solved by reducing the number of characters on the displayed keyboard and thereby allowing the size of the displayed characters to be

increased on the display. The number of displayed characters is reduced by dividing the alphanumeric characters of the keyboard into at least two non-overlapping sets of characters of a character set. This is clearly seen in Figures 2a-2c where the character set is divided into two different sets of characters, such as sets of characters 202 and 203 shown in Figure 2a, sets of characters 212 and 213 shown in Figure 2b, and sets of characters 222 and 223 shown in Figure 2c.

Argument

At section 3, the Office relies on paragraphs [0064] and [0103] of Dostie to state that the characters of the first set of characters are distinguished separately from the characters of the second set of characters, such as (1) highlighting/visual attribute and (2) being displayed in a list separate from qwerty graphic keyboard. Thus, the applicant assumes that the Office is asserting that the second set of characters referred to in Dostie correspond to the claimed second set of characters of said character set of claim 1; wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters independently of user input.

However, Dostie at paragraph [0064] teaches the set of (next) possible characters to be highlighted or emphasized using another visual queuing scheme (see, for example, the highlighted characters in Figure 3 of Dostie). Dostie at paragraph [0103] discusses that in an alternative configuration, the predicted set of next possible characters are displayed separately from the character entry system 28 on user interface 34 in a quick list of selectable characters (such as, for example, the predicted character list 28c in Figure 29). From these passages of Dostie, as well as Figures 3, 8, and 9, it becomes clear that the second set of characters and the first set of characters are, in fact, displayed simultaneously in Dostie.

Such simultaneous display of a first set of characters of a character set and a second set of characters of a character set is specifically excluded in the present invention as claimed in claim 1, since claim 1 states "wherein said display is configured to selectively display, for selection of which character to input, <u>either</u> the first set of

characters <u>or</u> the second set of characters" (emphasis added). In short, Dostie does not disclose or suggest a device to selectively display either the first set of characters of a character set or a second set of characters of a character set.

Furthermore, the keyboards disclosed in Kato also simultaneously display both sets of characters of a character set, such as the vowel key area 20A for inputting a vowel and the consonant key area 20B for inputting a consonant as illustrated in Figure 23, a figure which is referred to in the passages relied upon by the Office with respect to Kato (column 27, lines 22-28, 40-43, and column 28, lines 1-8 and 23-46).

Consequently, neither Dostie nor Kato disclose or suggest the feature of claim 1 that "said display is configured to selectively display, for selection of which character to input, either the first set of characters or the second set of characters".

The Office notes that Dostie fails to disclose the characters of the first set of characters and the characters of the second set of characters are mutually exclusive and relies on Kato for that feature. As noted above, Kato relates to a screen display key input unit for inputting characters and symbols indicated within a key area displayed on a screen of an electric tool (Kato, column 1, lines 6-13). Keys displayed on the screen are allocated at least first and second graphic character codes generating characters, digits, and symbols (Kato, column 2, lines 6-8).

However, to modify Dostie with the teachings of Kato would result in an incompatible device. Thus, assuming a person of ordinary skill in the art would be inclined to try to combine Dostie and Kato, such a person would arrive at an input mechanism wherein keyboards of Dostie are replaced by keyboards of Kato; that is, a keyboard wherein each key is associated with two characters (such as, Figure 3 of Kato).

If the keyboard illustrated in Figure 3 of Dostie is replaced by the keyboard of Figure 3 of Kato; then it is seen, for example, that the letters "q" and "w" are associated with the same key and the letters "e" and "r" are associated with the same key, etc. However, as noted in Figure 3 of Dostie, the letter "a" is not highlighted whereas the letter "s" is highlighted in view of the user input as shown at the top portion of Figure 3 upon entry of the letters "bu". Also, in Kato, the letters "a" and "s" are associated with the same key. Thus, it would be totally incompatible to use the keyboard in Kato with the keyboard

in Dostie or in any way try to modify the keys associated with completion entities most likely to succeed the keys that have already been input by the user as shown in Figure 3 of Dostie with keys that are mutually exclusive from characters which have been entered by the user.

In short, it makes absolutely no sense that the characters which have been input by the user (such as the characters "bu" in Figure 3) must then be associated with a second set of characters which are mutually exclusive of those characters and clearly Dostie teaches otherwise since in Dostie the highlighted keys are associated with completion words or entities most likely to follow what the user has already input as characters. The teachings of Dostie and Kato are incompatible with each other and therefore one of ordinary skill in the art would not combine them in the manner as suggested by the Office.

Furthermore, even if combined in the way as argued by the Office, neither Dostie nor Kato disclose or suggest a display which is configured to selectively display, for selection of which character to input, either the first set of characters or the second set of characters. Rather, both Dostie and Kato simultaneously display what the Office considers a second set of characters of a character set.

For all of the foregoing reasons, it is therefore respectfully submitted that claim 1 is distinguished over Dostie in view of Kato.

For similar reasons as those discussed above, it is respectfully submitted that independent claims 12, 21, and 29 are also not suggested by Dostie in view of Kato. Since each of the independent claims are distinguished over Dostie in view of Kato, it is respectfully submitted that the dependent claims are further distinguished over Dostie in view of Kato at least in view of their ultimate dependency from these independent claims.

Furthermore, applicant's attorney respectfully requests Examiner Augustine to contact the undersigned attorney if there are any remaining questions concerning the arguments presented herein.

The undersigned respectfully submits that no fee is due for filing this Response. The Commissioner is hereby authorized to charge to deposit account 23-0442 any fee deficiency required to submit this paper.

Respectfully submitted,

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